

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,  
  
Plaintiff,

Case No. 6:10-CV-00327-LED

**JURY TRIAL DEMANDED**

v.

VOLVO CONSTRUCTION EQUIPMENT  
NORTH AMERICA, INC., VOLVO  
TRUCKS NORTH AMERICA, INC.,  
KOMATSU AMERICA CORP.,  
CATERPILLAR INC., HYUNDAI  
CONSTRUCTION EQUIPMENT  
AMERICAS, INC., TOPCON TIERRA,  
STARTRAK SYSTEMS, LLC, WIRELESS  
MATRIX USA, LLC, JLG INDUSTRIES  
INC., TYLER TECHNOLOGIES, INC.,  
GEOTAB, INC., and NAVISTAR, INC.,

Defendants.

**DEFENDANT TOPCON TIERRA'S AND PLAINTIFF INNOVATIVE GLOBAL  
SYSTEMS LLC'S AGREED MOTION TO EXTEND DEADLINE TO COMPLY WITH  
P.R. 3-3 AND DISCOVERY ORDER 2**

Defendant Topcon Tierra ("Tierra") and Plaintiff Innovative Global Systems, LLC ("IGS") file this agreed motion to extend Tierra's deadline to comply with P.R. 3-3 and Discovery Order 2(B) [Docket Number 164] and any obligation of IGS to comply with Discovery Order 2(B) and (C) with respect to Tierra as follows:

Topcon Tierra requests that its deadline to comply with R.R. 3-3 and Discovery Order 2(B) be extended through and including February 28, 2011. IGS requests that any deadline for it to comply with Discovery Order 2(B) and (C) as to Tierra be extended through and including the same date. The purpose of this extension is to determine whether the ongoing negotiations regarding a resolution of Plaintiffs' claims can be brought to fruition. Tierra and IGS agree to the requested relief.

Date: February 11, 2011

Respectfully submitted,

**POTTER MINTON  
A Professional Corporation**

By: /s/ Michael E. Jones

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***Attorneys for Defendant and Counterclaimant***  
**TOPCON TIERRA**

Date: February 11, 2011

Respectfully submitted,

/s/ Michael T. Cooke  
(with permission by Michael E. Jones)

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**ATTORNEYS FOR PLAINTIFF  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 11, 2011. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Michael E. Jones